April 26, 2023

Ms Nancy Martins Clerk, Planning and Housing Committee Toronto City Hall 100 Queen Street West Toronto, Ontario M5H 2N2



RE: PH3.19 Toronto Green Standard Update: Advancing Net Zero Emissions in New Development

Chair and Members of the Planning and Housing Committee:

As you are likely aware the Residential Construction Council of Ontario (RESCON), and those within the residential construction sector, are fully supportive of every realistic and reasonable effort to advance green building standards as well as the pursuit of efforts to mitigate green house gas emissions.

However, it is the position of the sector that these objectives must reflect reasonable, realistic and implementable targets that while addressing environmental considerations also reflect the reality that the City of Toronto is in the midst of the most pressing and enduring housing affordability and supply crisis that the municipality has ever experienced.

We recognize that the subject agenda item relates to a Toronto Green Standards communications and engagement strategy. By way of this correspondence, we write to convey our concerns with respect to the lack of consultation with the broader residential construction sector by the City.

Regardless of initial indications from City staff that consultation would be undertaken with our organization and the residential construction sector, no engagement ever actually occurred.

This is particularly dismaying in view of the critical role that the residential construction sector holds in the housing ecosystem. Without the work of our members, workers and stakeholders, homes would not be built in Toronto or across the province.

We are frankly surprised that no sustained or reasonable efforts have been made to engage the residential construction sector. This regardless of our enduring undertakings to City staff, elected representatives and varied stakeholders to seek to engage in meaningful and constructive dialogue.

We maintain that any attempt to establish and implement a sound policy would require the full and engaged representation of the industry. We encourage you to consider the need to engage with the sector prior to proceeding with the proposed targets and policies as enunciated.

Thank you for the opportunity to provide this submission.

Yours truly,

Richard Lyall President Residential Construction Council of Ontario